

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION

FILED  
LODGED  
ENTERED  
RECEIVED  
*[Signature]*

APR 02 2014

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY *[Signature]* DEPUTY

LOUIS M. LUPO,

:

Plaintiff,

: Case No.: 8:14-cv-00475-DKC

:

vs.

:

JPMORGAN CHASE BANK, N.A., *et al.*,

:

Defendants.

:

**PLAINTIFF'S OPPOSITION TO DEFENDANT SPECIALIZED LOAN  
SERVICING'S MOTION TO TRANSFER, OR, IN THE ALTERNATIVE, TO  
DISMISS CERTAIN COUNTS IN PLAINTIF'S COMPLAINT**

Plaintiff Louis M. Lupo hereby opposes the motion of Defendant Specialized Loan Servicing, LLC ("SLS") to dismiss or transfer Plaintiff's Complaint or in the alternative, to dismiss Counts 11 and 12 (Violations of the Fair Debt Collection Practices Act), Count 15 (Tortious Interference with Employment Contract), Count 17 (Unjust Enrichment), Count 18 (Violation of Maryland's Consumer Protection Laws), Count 19 (Violation of the Maryland Consumer Debt Collection Act), and Count 20 (Violation of the Maryland Mortgage Fraud Act) as to Defendant SLS and in support thereof, says:

1. Plaintiff's Complaint arises from actions occurring in Maryland.
2. Plaintiff's Complaint requests only *in personam* relief.
3. Plaintiff has moved for leave to file an amended complaint, which amended complaint corrects the defects complained of in Defendant's Motion to Dismiss.

4. The Amended Complaint states a claim against SLS on the Violations of the Fair Debt Collection Practices Act, Tortious Interference with Employment Contract, now amended to Tortious Interference with Economic Relations, Unjust Enrichment, Violations of the Maryland Consumer Debt Collection Act, Violations of Maryland's Consumer Protection Laws, and Violations of the Maryland Mortgage Fraud Act.

5. Plaintiff incorporates by reference the attached Memorandum of Law.

WHEREFORE, Louis Lupo respectfully requests that this Honorable Court retain jurisdiction of his Complaint in this venue and deny SLS's Motion to Dismiss in its entirety.

Respectfully Submitted,



Louis M. Lupo, Pro Se  
545 Elmcroft Boulevard, Apt 10213  
Rockville, Maryland 20850  
Telephone: 202-290-4379  
louis.lupo@yahoo.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 31th day of March, 2014, a copy of the **PLAINTIFF'S OPPOSITION TO DEFENDANT SPECIALIZED LOAN SERVICING'S MOTION TO TRANSFER, OR, IN THE ALTERNATIVE, TO DISMISS CERTAIN COUNTS IN PLAINTIF'S COMPLAINT** was served *via* U.S. first class mail, postage prepaid, on the following:

Chad King, Esq.  
Simcox and Barclay, LLP  
888 Bestgate Road, Suite 313  
Annapolis, Maryland 21401  
*Attorneys for Defendant*  
*JPMorgan Chase Bank, N.A.*

Aaron D. Neal, Esq.  
McNamee, Hosea, Jernigan, Kim,  
Greenan & Lynch, P.A.  
6411 Ivy Lane, Suite 200  
Greenbelt, MD 20770  
*Attorney for Defendant*  
*Specialized Loan Servicing, LLC*



Louis M. Lupo, Pro Se  
545 Elmcroft Boulevard, Apt 10213  
Rockville, Maryland 20850  
Telephone: 202-290-4379  
louis.lupo@yahoo.com